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Attorney's Docket No.: 15786-007001

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Applicant : Kenneth L. Davis
Serial No. : 09/747,332
Filed : December 22, 2000

Art Unit : 2173
Examiner : Namitha Pillai

Title : Method and Apparatus for Conveying Design Information of Computer Aided Design (CAD) Models

Mail Stop Appeal Brief - Patents
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Attached to this facsimile communication cover sheet is **REPLY BRIEF**, faxed this 30th day of December, 2005, to the United States Patent and Trademark Office.

Respectfully submitted,

Date: Dec 30/05


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REPLY BRIEF

Pursuant to 37 C.F.R. § 41.41, Applicant responds to the Examiner's Answer as follows.

Examiner's Answer at p.8, para. 2.

The Examiner asserts that "Russell does disclose determining whether multimedia is associated with a geometry piece in response to detecting a cursor in the proximity of the geometry piece." The Examiner further refers to the flowchart shown in Russell's Figure 9, and asserts that at step 156 a "determination is made for whether multimedia is associated with a geometry piece". The applicant respectfully submits the Examiner has misinterpreted Figure 9 and is incorrect in asserting that Russell discloses determining whether multimedia is associated with a geometry piece in response to detecting a cursor in the proximity of the geometry piece, as is required by claim 1.

Claim 1 is directed to a method for generating an icon for accessing multimedia associated with a geometry piece of a CAD design. The method applies when the multimedia is already associated with the geometry piece, and in response to detecting a cursor in proximity of the geometry piece, the icon is automatically generated, and a user can thereby access the multimedia if desired. By contrast, the process shown in FIG. 9 of Russell is directed to a process for a user to annotate a 3-D model and link multimedia functions to the annotated model.

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Step 156 of the process states: "activate the pointer and select the function to link to the pointer". Activating a pointer is described in the specification as a user using a control device (e.g., a mouse) to position a cursor over the pointer and activate the control device (i.e., click on the mouse) [Col. 8, lines 46-60]. That is, a user takes steps to "activate the pointer" which results in the marker 42 appearing. Once the pointer is activated, a user can then take steps to link multimedia functions to the 3-D model, that is, to carry out the steps 157, 159, 160a-n, shown in Figure 9.

Step 157 clearly does not disclose the limitation of "in response to detecting the cursor in the proximity of the geometry piece, determining whether multimedia is associated with the geometry piece", as asserted by the Examiner. The Examiner has already clearly indicated that the pointer 41 of Russell is the "cursor" referred to in the above limitation. There is nothing in Russell to suggest that there is a detection of the pointer 41 in proximity of a geometry piece, and then in response to said detection, a determination of whether multimedia is associated with the geometry piece. Rather, what Russell discloses, and more particularly what is shown in Figure 9, which is relied on by the Examiner, is a user activating the pointer (e.g., by clicking on it with a mouse) and then taking steps to link multimedia to the 3-D model. There is no detection step, and no determination step in response thereto. The limitation is simply not satisfied by Russell.

Examiner's Answer at p. 10, para. 2.

The Examiner asserts at page 10, paragraph 2 that "Russell discloses that the marker or icon is automatically generated in response to positive determination that multimedia is associated with geometry piece". The applicant respectfully disagrees. The third limitation of claim 1 requires "in response to a positive determination that multimedia is associated with the geometry piece, automatically generating an icon associated with the geometry piece of the computer aided design for accessing the associated multimedia".

The Examiner has already asserted that the marker 42 disclosed in Russell is the "icon" in claim 1 that is automatically generated. There is no disclosure or suggestion in Russell that the marker 42 is automatically generated in response to a positive determination that multimedia is associated with the geometry piece. Russell is quite clear about the purpose of a marker. A marker is to indicate a pointer as being an activated pointer [Col. 6, lines 55, 56]. If a user wants

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to link multimedia to a 3D model through a pointer, the user must first activate the pointer (*e.g.*, by using a mouse to click on the pointer) [Col. 8, lines 64-65]. If a user wants to access a multimedia function that is already linked to the 3D model through a pointer, the user again must first take an active step to activate the pointer, at which time the marker is displayed to mark the pointer as activated [Col. 9, lines 46-47]. In either case, the marker is displayed in response to a selection to activate the pointer, *e.g.*, by a user clicking a mouse on the pointer. A significant difference between what is claimed and Russell is Russell's process being largely user driven, for example, a user activates a pointer – which activation is what causes a marker to be displayed. The marker can be displayed whether or not there is multimedia linked to the 3D model, so clearly, the marker is not displayed in response to a positive determination of multimedia associated with a geometry piece, as required by the claim.

By contrast, the claim requires there first be a detection of a cursor in proximity of the geometry piece, then in response to said detection, a determination of whether multimedia is associated with the geometry piece, and then, in response to a positive determination, an automatic generation of an icon to access the multimedia. The above described sequence of steps clearly is not disclosed or suggested in Russell.

Examiner's Answer at page 4, para. 1.

The Examiner states in the first paragraph on page 4 of the Examiner's Answer that "it is clear that a geometry piece without a multimedia link when activated would not invoke a marker icon to represent the existence of a multimedia item." The applicant wants to clarify that although the marker in that instance may not represent the existence of a multimedia item, a marker will, in any event, be displayed. The Examiner has asserted that the marker 42 disclosed in Russell corresponds to the icon generated in the third limitation of the applicant's claim 1. It is clear from Russell that every time a pointer is activated a marker is displayed [see for example, Col. 6, lines 55-56; Col. 8, lines 50-51; Col. 12, lines 4-5]. If there is no multimedia linked to the pointer, a user can then take steps to link multimedia [Col. 8, lines 64-65]. If multimedia is already linked to the pointer, then upon activating the pointer, immediate and/or delayed multimedia functions can be executed [Col. 12, lines 4-22]. In any event though, once the pointer is activated, the marker is displayed. Display of the marker is in response to a user selecting to

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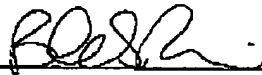
activate a pointer. Display of the marker is not in response to a positive determination that multimedia is associated with the geometry piece in further response to a detection of a cursor in proximity of the geometry piece, as required by claim 1. Again, the third limitation of claim 1 is clearly not satisfied by Russell.

For these reasons, and the reasons stated in the Appeal Brief, Applicant submits that the final rejection should be reversed.

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Respectfully submitted,

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